

MAT HOLDINGS, INC.



JOB APPLICANT PRIVACY POLICY & NOTICE OF COLLECTION

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Scope of this Policy

MAT Holdings, Inc. and/or any affiliated entities (collectively, the “Company” or “we”) has developed this Privacy Policy out of respect for the privacy of our job applicants. This policy describes the personal information we collect, use, and disclose about individuals who apply for a position of employment. This is also to provide you with notice at or before the point at which we collect personal information from you informing you of what information we collect, how we use it, how long we retain it, and whether we sell it or share it for cross-context behavioral advertising purposes.

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This Privacy Policy applies only to your interaction with the Company in the capacity of a job applicant. It does not apply to other contexts, such as if you are hired for employment, in which case you would be provided access to a privacy policy that covers information collected in the employment context, or if you visit our public-facing website or engage in transactions with the Company in other capacities (as a client, customer, or independent contractor), in which case the privacy policy on our website <https://gabriel.com/> would apply to those interactions.

Collection of Personal Information and Sensitive Personal Information

When you apply for a position or interact with us regarding potential job openings, we may collect Personal Information from you in a variety of different situations and using a variety of different methods, including, but not limited to, on our website, your mobile device, through email, in physical locations, through written applications, through the mail, and/or over the telephone. Generally, we may collect, and we have in the last 12 months collected, the following categories of personal information from or about job applicants. For each category of information, we identify below the categories of third parties, service providers, and contractors to whom we have disclosed the information in the last 12 months. The examples provided for each category are not intended to be an exhaustive list or an indication of all specific pieces of information we collect from or about you in each category, but rather the examples are to provide you a meaningful understanding of the types of information that may be collected within each category.

Category	Personal Identifiers
Examples	Name, alias, social security number, date of birth, driver's license or state identification card number, passport number, employee ID number.
Disclosed in Last 12 Months To	<ul style="list-style-type: none">• Government agencies• Talent acquisition management systems• Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process• Recruiting and staffing firms or agencies• Social media platforms• IT, cybersecurity, and privacy vendors and consultants
Retention Period	Data retained until third party applicant tracking system contract's termination. Once a contract is terminated, data will be deleted after 60 days.

Category	Contact Information
Examples	Home, postal or mailing address, email address, home phone number, cell phone number.
Disclosed in Last 12 Months To	<ul style="list-style-type: none">• Government agencies• Talent acquisition management systems• Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process• Recruiting and staffing firms or agencies• Social media platforms• IT, cybersecurity, and privacy vendors and consultants
Retention Period	If hired, this data will be retained permanently. If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.

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Category	Pre-Hire Information
Examples	Information provided in your job application or resume, information gathered as part of background screening and reference checks, pre-hire drug test results, information recorded in job interview notes by persons conducting job interviews for the Company, information contained in candidate evaluation records and assessments, information in work product samples you provided, and voluntary disclosures by you, such as protected classifications.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> Talent acquisition management systems Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process Recruiting and staffing firms or agencies
Retention Period	If hired, this data will be retained for duration of employment plus 6 years. If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.

Category	Employment History
Examples	Information regarding prior job experience, positions held, and when permitted by applicable law your salary history or expectations.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> Talent acquisition management systems Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process Recruiting and staffing firms or agencies
Retention Period	If hired, this data will be retained for duration of employment plus 6 years. If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.

Category	Education Information
Examples	Information from resumes regarding educational history; information obtained from transcripts or records of degrees and vocational certifications obtained.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> Talent acquisition management systems Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process Recruiting and staffing firms or agencies
Retention Period	If hired, this data will be retained for duration of employment plus 6 years. If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.

Category	Internet, Network, and Computer Activity
Examples	Internet or other electronic network activity information related to a job applicant's usage of Company networks, servers, intranet, or Company-owned computers and electronic devices, including system and file access logs, security clearance level, browsing history, search history, and usage history.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> IT, cybersecurity, and privacy vendors and consultants
Retention Period	4 years

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Category	Mobile Device Security Information
Examples	Data identifying a job applicant's device accessing Company networks and systems, including cell phone make, model, and serial number, cell phone number, and cell phone provider.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> IT, cybersecurity, and privacy vendors and consultants
Retention Period	4 years

Category	Online Portal and Mobile App Access and Usage Information
Examples	Where job applicant or candidate must create an account to apply for a job, collect the applicant's username and password, account history, usage history, and any information submitted through the account.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> IT, cybersecurity, and privacy vendors and consultants
Retention Period	Username kept indefinitely; passwords while in use + last 8 passwords used or for 2 years, whichever is longer; rest of this category for 4 years

Category	Inferences
Examples	Based on analysis of the personal information collected, we may develop inferences regarding job applicants' predispositions, behavior, attitudes, intelligence, abilities, and aptitudes for purposes of recruiting and hiring assessments and decisions.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> Talent acquisition management systems Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process Recruiting and staffing firms or agencies
Retention Period	If hired, this data will be retained for duration of employment plus 6 years. If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.

Category	Medical and Health Information
Examples	Information related to symptoms, exposure, contact tracing, diagnosis, testing, or vaccination for infectious diseases (e.g., COVID-19), pandemics, or other public health emergency.
Disclosed in Last 12 Months To	Not Disclosed
Retention Period	If hired, this data will be retained for duration of employment plus 6 years. If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.

What Sensitive Personal Information We Collect

Of the above categories of Personal Information, the following are categories of Sensitive Personal Information the Company may collect:

- Personal Identifiers (social security number, driver's license or state identification card number, passport number)

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- Account Information (your Company account log-in, in combination with any required security or access code, password, or credentials allowing access to the account)
- Medical and Health Information

Personal information ***does not*** include:

- Publicly available information from government records.
- Information that a business has a reasonable basis to believe is lawfully made available to the general public by the job applicant or from widely distributed media.
- Information made available by a person to whom the job applicant has disclosed the information if the job applicant has not restricted the information to a specific audience.
- De-identified or aggregated information.

Sources of Personal Information

We may collect your personal information from the following sources:

- You, the applicant, when you apply for a position of employment or voluntarily submit information
- Company systems, networks, software applications, and databases you log into or use in the course of applying for a position with the Company, including from vendors the Company engages to manage or host such systems, networks, applications or databases
- Surveillance cameras at our physical locations
- Credit and consumer reporting agencies
- HR support vendors
- Recruiters
- Staffing agencies
- Job platforms and career sites like Indeed, LinkedIn, etc.
- Personal references and former employers
- Schools, universities, or other educational institutions which you attended
- From friends, family, or colleagues who choose to email you jobs that they think you may be interested in from our application platform
- Our employees, contractors, vendors, suppliers, guests, visitors, and customers based on your interactions with them (if any)

To Whom We Disclose Personal Information

We may disclose your personal information to the following categories of service providers, contractors, or third parties:

- Government agencies
- Talent acquisition management systems
- Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process
- Recruiting and staffing firms or agencies
- Social media platforms

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- IT, cybersecurity, and privacy vendors and consultants

Reasons Why We Collect, Use, Retain, and Disclose Personal Information

We may collect, use, and disclose your personal information for any of the following business purposes:

1. To fulfill or meet the purpose for which you provided the information. For example, if you share your name and contact information to apply for a job with the Company, we will use that Personal Information in connection with your candidacy for employment.
2. To comply with local, state, and federal law and regulations requiring employers to maintain certain records (such as immigration compliance records, accident or safety records, and tax records).
3. To evaluate, make, and communicate decisions regarding your job application and candidacy for employment.
4. To obtain and verify background checks, references, and employment history.
5. To communicate with you regarding your candidacy for employment.
6. To permit you to create a job applicant profile, which you can use for filling out future applications if you do not get the job you are apply for.
7. To keep your application on file even if you did not get the job applied for, in case there is another position for which we want to consider you as a candidate even if you do not formally apply.
8. To evaluate and improve our recruiting methods and strategies.
9. To engage in lawful monitoring of job applicant activities and communications when they are on Company premises, or utilizing Company internet and WiFi connections, computers, networks, devices, software applications or systems.
10. To engage in corporate transactions requiring review or disclosure of job applicant records subject to non-disclosure agreements, such as for evaluating potential mergers and acquisitions of the Company.
11. To evaluate, assess, and manage the Company's business relationship with vendors, service providers, and contractors that provide services to the Company related to recruiting or processing of data from or about job applicants.
12. To improve job applicant experience on Company computers, networks, devices, software applications or systems, and to debug, identify, and repair errors that impair existing intended functionality of our systems.
13. To protect against malicious or illegal activity and prosecute those responsible.
14. To prevent identity theft.
15. To verify and respond to consumer requests from job applicants under applicable consumer privacy laws.

We do **NOT** and will not sell your personal information in exchange for monetary or other valuable consideration. We do not share your personal information for cross-context behavioral advertising.

We do **NOT** and will not use or disclose your sensitive personal information for any purposes that give rise to a right to limit the use or disclosure of your sensitive personal information under the California Consumer Privacy Act (CCPA), if it applies and you are a California resident.

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Retention of Personal Information

We will retain each category of personal information in accordance with our established data retention schedule, as indicated in the table above. Some of the retention periods in the retention schedule above are measured from a particular point in time that has not occurred yet, such as the end of employment or end of a relationship (whether business, contractual, or transactional) plus a certain number of years. Where no particular event is defined in the retention schedule as the point from which the retention period is measured, we will measure the retention period from either (1) the date the record or data was collected, created, or last modified, (2) the date of the particular transaction to which the record or data pertains, or (3) another triggering event that is determined to be reasonable and appropriate based on the nature of the data and the legal/business needs for its continued use.

In deciding how long to retain each category of personal information that we collect, we consider many criteria, including, but not limited to: the business purposes for which the Personal Information was collected; relevant federal, state and local recordkeeping laws; applicable statute of limitations for claims to which the information may be relevant; and legal preservation of evidence obligations.

We apply our data retention procedures on an annual basis to determine if the business purposes for collecting the personal information, and legal reasons for retaining the personal information, have both expired. If so, we will purge the information in a secure manner.

Third-Party Vendors

We may use other companies and individuals to perform certain functions on our behalf. Examples include administering e-mail and payroll services. Such parties only have access to the personal information needed to perform these functions and may not use or store the information for any other purpose.

Business Transfers

In the event we sell or transfer a particular portion of our business assets, employee information may be one of the business assets transferred as part of the transaction. If substantially all of our assets are acquired, employee information may be transferred as part of the acquisition.

Compliance With Law and Safety

We may disclose specific personal and/or sensitive personal information based on a good faith belief that such disclosure is necessary to comply with or conform to the law or that such disclosure is necessary to protect our employees or the public.

Passwords

The personal data record created through your registration for your Company account can only be accessed with the unique password associated with those records. To protect the integrity of the information contained in those records, you should not disclose or otherwise reveal your passwords to third parties.

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Job Applicants Under the Age of 16

We do not knowingly collect or disclose, let alone sell or share, the personal information of job applicants under 16 years of age.

How We Protect the Information That We Collect

The protection of the information that we collect about employees is of the utmost importance to us and we take every reasonable measure to ensure that protection, including:

- We keep automatically collected data and voluntarily collected data separate at all times.
- We use internal encryption on all data stores that house voluntarily captured data.
- We use commercially reasonable tools and techniques to protect against unauthorized access to our systems.
- We restrict access to private information to those who need such access in the course of their duties for us.

Rights Under the CCPA and CPRA

This section of the Privacy Policy applies only to California residents. If you are a California resident, you have the following rights pursuant to the California Consumer Privacy (CCPA) as amended by the California Privacy Rights Act (CPRA):

1. Right to Know. The right to request, up to 2 times in a 12-month period, that we identify to you (1) the categories of personal information we have collected, shared or sold about you, (2) the categories of sources from which the personal information was collected, (3) the business purpose for which we use this information, and (4) the categories of third parties with whom we disclose or have disclosed your personal information;
2. Right to Access. The right to request, up to 2 times in a 12-month period, that we provide you access to or disclose to you the specific pieces of personal information we have collected about you;
3. Right to Delete. The right to request, up to 2 times in a 12-month period, that we delete personal information that we have collected from you, subject to certain exceptions;
4. Right to Correct. The right to request that we correct inaccurate personal information (to the extent such an inaccuracy exists) that we maintain about you;
5. The right to designate an authorized agent to submit one of the above requests on your behalf. See below for how you can designate an authorized agent; and
6. The right to not be discriminated or retaliated against for exercising any of the above rights.

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You Can Submit Any of the Above Types of Requests by Any of the Options Below:

1. Submit an online request on our website at report.syntrio.com/matholdingsinc.
2. Call our privacy toll-free line at 833-415-4333.

How We Will Verify That it is Really You Submitting the Request:

If you are a California resident, when you submit a Right to Know, Right to Access, Right to Delete, or Right to Correct request through one of the methods provided above, we will ask you to provide some information in order to verify your identity and respond to your request. Specifically, we will ask you to verify information that can be used to link your identity to particular information in our possession, which depends on the nature of your relationship and interaction with us.

Responding to your Right to Know, Right to Access, Right to Delete, and Right to Correct Requests

Upon receiving a verifiable request from a California resident, we will confirm receipt of the request no later than 10 business days after receiving it. We endeavor to respond to a verifiable request within forty-five (45) calendar days of its receipt. If we require more time (up to an additional 45 calendar days, or 90 calendar days total from the date we receive your request), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

For a request to correct inaccurate personal information, we will accept, review, and consider any documentation that you provide, and we may require that you provide documentation to rebut our own documentation that the personal information is accurate. You should make a good-faith effort to provide us with all necessarily information at the time that you make the request to correct. We may deny a request to correct if we have a good-faith, reasonable, and documented belief that a request to correct is fraudulent or abusive. If we deny your request to correct, we shall inform you of our decision not to comply and provide an explanation as to why we cannot comply with a request, if applicable.

If You Have an Authorized Agent:

If you are a California resident, you can authorize someone else as an authorized agent who can submit a request on your behalf. To do so, you must either (a) execute a valid, verifiable, and notarized power of attorney, or (b) provide other written, signed authorization that we can then verify. When we receive a request submitted on your behalf by an authorized agent who does not have a power of attorney, that person will be asked to provide written proof that they have your permission to act on your behalf. We will also contact you and ask you for information to verify your own identity directly and not through your authorized agent. We may deny a request from an authorized agent if the agent does not provide your signed permission demonstrating that they have been authorized by you to act on your behalf.

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Consent to Terms and Conditions

By applying for a position with the Company or submitting any information for purposes of being considered for or inquiring about employment with the Company, you consent to all terms and conditions expressed in this Privacy Policy.

Changes to Our Privacy Policy

As our services evolve and we perceive the need or desirability of using information collected in other ways, we may from time to time amend this Privacy Policy. We encourage you to check our website frequently to see the current Privacy Policy in effect and any changes that may have been made to them. If we make material changes to this Privacy Policy, we will post the revised Privacy Policy and the revised effective date on this website. Please check back here periodically or contact us at the address listed at the end of this Privacy Policy.

Individuals With Disabilities

This Policy is in a form that is or will be made accessible to individuals with disabilities.

Questions About the Policy

If you have any questions about this Privacy Policy, please contact us at info@matholdingsinc.com or call 847-821-9630.

*****This Policy was last updated May 20, 2025.***